Case 1:11-cv-00138-L -DLM Document 15 Filed 08/30/11 Page 1 of 3 PageID #: 223 Case 1:11-cv-00138-L -DLM Document 14 Filed 08/19/11 Page 1 of 3 PageID #: 220

THE UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

MARK AHLQUIST, as next friend, parent and guardian of J.A., a minor)	
Plaintiff,)	
v.))	C.A. No. 11-138-L
CITY OF CRANSTON, by and through Robert F. Strom,)	
in his capacity as Director of Finance, and by and through)	
the School Committee of the City of Cranston, and)	
SCHOOL COMMITTEE OF THE CITY OF CRANSTON	,)	
by and through Andrea Iannazzi, in her capacity as Chair)	
of the School Committee of the City of Cranston,)	
Defendants.)	

STIPULATION

Plaintiff Mark Ahlquist and Defendants City of Cranston and School Committee of the City of Cranston hereby agree and stipulate as follows:

- (a) The parties hereby waive their right to a trial by jury;
- (b) Pursuant to Fed. R. Civ. P. 65, the Court may advance the trial on the merits and consolidate it with the hearing on Plaintiff's Motion for Preliminary Injunction;
- (c) The hearing shall be held on October 2011 at 2:00 p.m.; in lieu of live testimony, the parties will present as evidence deposition transcripts, affidavits and pre-numbered exhibits;
 - (d) The parties shall each file a Memorandum of Law on or before September 2, 2011;
- (e) The parties may each file a reply Memorandum of Law on or before September 16, 2011;
- (f) In the event of a liability finding against either or both Defendants, the Court shall determine to what extent equitable and/or declaratory relief may be warranted and each party reserves the right to argue his or its position thereon. In addition to any equitable or declaratory

Case 1:11-cv-00138-L -DLM Document 15 Filed 08/30/11 Page 2 of 3 PageID #: 224 Case 1:11-cv-00138-L -DLM Document 14 Filed 08/19/11 Page 2 of 3 PageID #: 221

relief which the Court may award, the parties agree that Plaintiff shall be awarded compensatory damages in the amount of \$25.00.

Ronald & - Lognows

Attorneys for Plaintiff

/s/ Lynette Labinger
Lynette Labinger #1645
Roney & Labinger LLP
Cooperating Counsel,
Rhode Island Affiliate,
American Civil Liberties Union
344 Wickenden Street
Providence, RI 02903
Telephone: (401) 421-9794
labinger@roney-labinger.com

/s/ Thomas R. Bender
Thomas R. Bender #2799
Hanson Curran LLP
Cooperating Counsel,
Rhode Island Affiliate,
American Civil Liberties Union
One Turks Head Place – Suite 550
Providence, RI 02903
Telephone: (401) 421-2154
trb@hansoncurran.com

Attorneys for Defendants

/s/ Joseph V. Cavanagh, Jr.
/s/ Joseph V. Cavanagh, III
Joseph V. Cavanagh, Jr. #1139
Joseph V. Cavanagh, III #6907
Blish & Cavanagh, LLP
30 Exchange Terrace
Providence, Rhode Island 02903
Telephone: (401) 831-8900
jvc@blishcavlaw.com
jvc3@blishcavlaw.com

Case 1:11-cv-00138-L -DLM Document 15 Filed 08/30/11 Page 3 of 3 PageID #: 225 Case 1:11-cv-00138-L -DLM Document 14 Filed 08/19/11 Page 3 of 3 PageID #: 222

/s/ Christopher M. Rawson
Christopher M. Rawson #5191
Cranston City Solicitor
City Hall - 869 Park Avenue
Cranston, Rhode Island 02910
Telephone: (401) 780-3133
crawson@lovettlaw.com

Of Counsel:

Eric C. Rassbach, Esq.
Lori H. Windham, Esq. (admitted pro hac vice)
Joshua Hawley, Esq.
The Becket Fund for Religious Liberty
3000 K St. NW, Suite 220
Washington, D.C. 20007
Telephone: (202) 955-0095
Facsimile: (202) 955-0090
erassbach@becketfund.org
lwindham@becketfund.org
jhawley@becketfund.org